

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

DAVID M. SKEBERDIS
151 Pinon Trail
Cedar Crest, NM 87008

*

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and

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KARA SKEBERDIS
151 Pinon Trail
Cedar Crest, NM 87008

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Plaintiffs

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v.

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CLARK BRILL, M.D.
6423 Fewstar Court
Columbia, Maryland 21044

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Civil Action: _____

and

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JOHN P. COLLINS, D.O.
5005 Signal Bell Lane, Suite 208
Clarksville, Maryland 21029

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and

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DRS. COLLINS, BRILL AND TWIGG, P.C.
t/a Maryland Spine and Sports Medicine
6423 Fewstar Court
Columbia, Maryland 21044

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SERVE ON:

Clark Robert Brill, M.D.

*

6423 Fewstar Court

Columbia, Maryland 21044

*

and

*

MARYLAND SPINE AND SPORTS
SURGI-CENTER, LLC

*

5005 Signal Bell Lane, Suite 207
Clarksville, Maryland 21029

*

*

SERVE ON:

DRS. COLLINS, BRILL AND TWIGG,
P.C.

*

5005 Signal Bell Lane, Suite 207
Clarksville, Maryland 21029

*

*

Defendants

*

COMPLAINT AND ELECTION FOR JURY TRIAL

The Plaintiffs, David M. Skeberdis and Kara Skeberdis, by their attorneys, Henry E. Dugan, Jr., Alison D. Kohler, and Dugan, Babij, Tolley & Kohler, LLC, sue the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine, and Maryland Spine and Sports Surgi-Center, LLC, and state:

PROCEDURAL HISTORY

1. This matter as against Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine, and Maryland Spine and Sports Surgi-Center, LLC, was filed with the Health Care Alternative Dispute Resolution Office on or about October 17, 2016. A copy of the Claim Form and Statement of Claim is attached hereto as *Exhibit 1* and prayed to be taken as part hereof.

2. The Plaintiffs filed a Certificate of Merit and Report of Stephen M. Thomas, M.D. with the Health Care Alternative Dispute Resolution Office of Maryland, on or about January 10, 2017. A copy of the Certificate of Merit and Report is attached hereto as *Exhibit 2* and prayed to be taken as part hereof.

3. The Plaintiffs also filed a Notice of Election to Waive Arbitration, pursuant to Md. Cts. & Jud. Procs. Code Ann. § 3-2A-06A, in the Health Care Alternative Dispute Resolution Office on or about January 10, 2017. A copy of the Notice of Election to Waive Arbitration is attached hereto as *Exhibit 3*, and prayed to be taken as part thereof.

4. On or about January 11, 2017, an Order of Transfer was issued by the Health Care Alternative Dispute Resolution Office. A copy of the Order to Transfer is attached hereto as *Exhibit 4*, and prayed to be taken as part hereof.

5. These claims were properly filed in the Health Care Alternative Dispute Resolution Office as they exceed Thirty Thousand Dollars (\$30,000.00) in damages, and were properly waived out of the Health Care Alternative Dispute Resolution Office pursuant to Md. Cts. & Jud. Procs. Code Ann. § 3-2A-06A. All conditions precedent to the filing of these claims have been met.

6. The Plaintiffs relate back to, repeat, re-allege, adopt and incorporate by reference the Statement of Claim filed with the Health Care Alternative Dispute Resolution Office on or about October 17, 2016.

PARTIES

1. Plaintiff, David M. Skeberdis, is an adult citizen of New Mexico, residing at 151 Pinon Trail, Cedar Crest, New Mexico 87008.

2. Plaintiff, Kara Skeberdis, is an adult citizen of New Mexico, residing at 151 Pinon Trail, Cedar Crest, New Mexico 87008.

3. At all relevant times, Plaintiffs David M. Skeberdis and Kara Skeberdis were husband and wife.

4. Defendant, Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine, is a corporation organized and existing under the laws of the State of Maryland, with its principal place of business at 5005 Signal Bell Lane, Suite 208, Clarksville, Maryland 21029. At all relevant times, Drs. Collins, Brill and Twigg, P.C., operated a physical medicine and rehabilitation practice, including pain management under the trade name Maryland Spine and Sports Medicine, and was the employer and/or the actual and/or apparent principal of Defendants Brill and Collins.

5. Defendant, Maryland Spine and Sports Surgi-Center, LLC, is a corporation organized and existing under the laws of the State of Maryland, with its principal place of business at 5005 Signal Bell Lane, Suite 207, Clarksville, Maryland 21029, and was the surgi-center in which Plaintiff David Skeberdis received epidural injections into the cervical spine on or about October 23, 2013.

6. Defendant, Clark Brill, M.D., is an adult citizen of the State of Maryland, residing in Howard County, Maryland, who currently and at all times complained of herein was and is licensed to practice medicine in the State of Maryland within the specialty of physical medicine and rehabilitation and was and is carrying on a regular business in Howard County, Maryland, with his principal place of business at 5005 Signal Bell Lane, Suite 208, Clarksville, MD 21029. At all times complained of, Dr. Brill was acting as an agent, servant and/or employee, real, apparent and/or ostensible of the Defendants, Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine and/or Maryland Spine and Sports Surgi-Center, LLC.

7. Defendant, John P. Collins, D.O. is an adult citizen of the State of Maryland, who currently and at all times complained of herein was and is licensed to

practice medicine in the State of Maryland within the specialty of physical medicine and rehabilitation and was and is carrying on a regular business in Howard County, Maryland, with his principal place of business at 5005 Signal Bell Lane, Suite 208, Clarksville, MD 21029. At all times complained of, Dr. Collins was acting as an agent, servant and/or employee, real, apparent and/or ostensible of the Defendants, Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine and/or Maryland Spine and Sports Surgi-Center, LLC.

8. Hereinafter in this Complaint, the Defendants Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill and Twigg, P.C., t/a Maryland Spine and Sports Medicine, and Maryland Spine and Sports Surgi-Center, LLC, individually and/or through their respective agents, servants and/or employees (both actual and apparent) will be collectively referred to as “the Defendants.”

AMOUNT OF CLAIM AND VENUE

9. The amount of this claim exceeds Seventy Five Thousand Dollars (\$75,000.00), and jurisdiction and venue are appropriate in the United States District Court for the District of Maryland, pursuant to 28 U.S.C. §1332 and §1391, because all Defendants are residents of Maryland and there is complete diversity of citizenship between the parties.

FACTS COMMON TO ALL COUNTS

10. On or about October 23, 2013, Plaintiff David Skeberdis presented to Defendant Clark Brill, M.D. with complaints of recurrent neck pain. Dr. Brill’s note states that he had successfully performed a block injection on Mr. Skeberdis two years prior, and proceeded to repeat the procedure.

11. According to the chart of Defendants, the Defendants “began to approach the C6 and C7 foramen, but each time we encountered irritation of the brachial plexus and he [Mr. Skeberdis] started having pain in his arm.” Dr. Brill then injected dye to “light up the brachial plexus.” However, he was unable to find an approach that avoided the brachial plexus and converted the procedure to a central epidural. Dr. Brill’s note indicated that he injected 80 mg of Kenalog into the cervical epidural space, but he was uncertain if the medication actually entered the epidural space.

12. On October 24 and 25, 2013, Mr. Skeberdis noted increased pain, soreness and swelling in his neck and upper back. On October 26, 2013, Plaintiff Skeberdis called the office of Defendants and talked to the on-call doctor, Dr. Collins. Mr. Skeberdis reported that he was experiencing intense pain in his neck and upper back. Dr. Brill’s partner, John P. Collins, D.O., prescribed methylprednisone without examining Mr. Skeberdis and/or ruling out infection. Giving a steroid to a patient with signs or symptoms of an infection is contraindicated. The prescription was filled and taken by Mr. Skeberdis on October 26, 2013.

13. On October 26, 2013, throughout the evening and night, Mr. Skeberdis’ pain levels increased to an intolerable level. Mr. Skeberdis was unable to sleep. He was in severe pain with bilateral arm numbness and an inability to turn his neck. He developed nausea. He developed fevers, chills, and sweats. His neck and upper back became red and swollen. In the morning of October 27, 2013, Mr. Skeberdis was taken by ambulance to the emergency department of Howard County General Hospital, where he was seen at or about 8:29 am.

14. While in the emergency department, Mr. Skeberdis complained of swelling in his face and neck, and was observed to lose consciousness and was unresponsive for about 20 seconds. His neck was observed to be red and swollen. His blood work was suspicious for systemic infection. The emergency room physician, Shahab Z. Bavani, M.D., noted a temperature of 101.2, WBC of 16.7 and leukocytosis of 60.7. Mr. Skeberdis was admitted for further work up and pain control, with a primary diagnosis of systemic inflammatory response syndrome and possible cellulitis. An MRI of the neck was ordered and infectious disease and orthopedic consults were requested. Mr. Skeberdis was placed on IV vancomycin.

15. After admission, Mr. Skeberdis continued to report sharp pain in his neck, radiating to the shoulder blades and arms, and numbness in his hands. He was unable to sit up without assistance and pain, and experienced pain when turning his head. The MRI showed inflammation and edema consistent with diffuse fasciitis, and loss of muscle striation suggestive of myositis. An infectious disease consult was provided by Angela M. Kopack, M.D., who diagnosed sepsis on admission with fever and leukocytosis. Dr. Kopack identified the source of infection as the cervical soft tissue infection s/p epidural injection. Mr. Skeberdis was continued on vancomycin and meropenem.

16. Overnight from October 29 to 30, 2013, Mr. Skeberdis developed a high fever. A repeat MRI evaluation on October 30, 2013 showed worsening infection with epidural abscess, extensive inflammation and microabscesses in the cervical and paraspinal muscles of the cervical and thoracic area, extending into the chest wall.

17. Mr. Skeberdis was taken to the operating room on October 30, 2013, where Lawrence Shin, M.D. performed a C4-T4 laminectomy with evacuation of

epidural, paraspinal, and right shoulder abscesses. During the procedure, Dr. Shin encountered several areas of purulent material and pus, including a focus of pus localized to the C6 level, and gross pus under pressure at the C6 level. The wound was left open. Cultures grew MRSA. Mr. Skeberdis remained on IV antibiotics following the surgery.

18. On October 31, 2013, Mr. Skeberdis was transferred to Johns Hopkins Hospital, Bayview Medical Center for further treatment. He underwent an additional operation for wound exploration and wound closure on November 4, 2013 and was discharged home on IV antibiotic therapy on November 12, 2013.

COUNT I
(Negligence- - All Defendants)

The Plaintiff, David M. Skeberdis, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 18 of this Complaint as though fully set forth herein.

19. At all times of which the Plaintiff complains, the Defendants Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC represented to the public and the Plaintiff possession of that degree of skill, knowledge and ability ordinarily possessed by reasonably competent medical physicians delivering physical medicine and rehabilitation care and pain management care.

20. At all times of which the Plaintiff complains, the Defendants, Clark Brill, M.D. and John P. Collins, D.O., were acting individually and as the actual and/or apparent agents, servants and/or employees of the Defendants, Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and/or Maryland Spine and Sports Surgi-Center, LLC.

21. The Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and/or through their real, apparent and/or ostensible agents, servants and/or employees, owed to the Plaintiff David M. Skeberdis the duty to exercise that degree of care, skill and judgment ordinarily expected of reasonably competent physicians and surgi-centers delivering pain management and physical medicine and rehabilitation. That duty included ensuring that when performing any epidural injection, the patient, the surgical field, the procedure area and all equipment and instrumentation be sterilized and that a sterile environment be maintained throughout the entire course of the procedure. That duty also required that all substances that are injected or used during the procedure be sterile. That duty also included the proper interpretation and performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff David M. Skeberdis, the prompt employment of appropriate procedures and treatments to correct such a condition(s); continuous evaluation of the course of such treatment(s) in response to such evaluation(s); appropriate notification to the Plaintiff David M. Skeberdis of the various alternatives and risks involved in the various modalities of treatment and timely referral to a hospital for further care.

22. Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and by and through their real, apparent and/or ostensible agents, servants and/or employees, breached the standard of care and were negligent in

their care and treatment of Plaintiff David M. Skeberdis. These breaches of the standard of care include, but are not limited to, the following:

- A. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the medical status and/or conditions of the Plaintiff, David M. Skeberdis;
- B. Failing to exercise reasonable care in the timely and careful diagnosis of such conditions;
- C. Failing to exercise reasonable care in employing appropriate treatments and surgical referrals to correct and address such conditions;
- D. Failing to employ adequate procedures before or during Mr. Skeberdis' injection procedure to ensure a sterile operating field with sterile instruments, medications and/or dyes;
- E. Failing to properly supervise and oversee the sterilization of surgical instruments and/or techniques;
- F. Failing to provide and maintain a sterile and safe procedure room for Plaintiff Skeberdis' injections;
- G. Failing to timely identify the potential infection and/or refer Mr. Skeberdis to the emergency room for evaluation and diagnosis;
- H. Prescribing methylprednisone in the face of signs and symptoms of infection;
- I. Failing to treat Mr. Skeberdis in an appropriate and timely manner; and
- J. Being otherwise careless and negligent.

23. As a direct and proximate result of the negligent, inadequate, inappropriate, and substandard care by the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and

Maryland Spine and Sports Surgi-Center, LLC., individually and by and through their real, apparent and/or ostensible agents, servants and/or employees, the Plaintiff, David M. Skeberdis was injured and damaged.

24. The Plaintiff avers that as a direct and proximate result of the negligent care by the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and by and through their real, apparent and/or ostensible agents, servants and/or employees, the Plaintiff, David Skeberdis suffered permanent disability, severe physical pain, increased suffering, emotional distress, mental anguish, physical debilitation and disability, unnecessary procedures, unnecessary hospital and medical care and expenses, permanent and total disability, and was otherwise hurt, injured and/or damaged, without any negligence on the part of the Plaintiff contributing thereto.

25. The Plaintiff further avers that all of the injuries, damages and losses sustained by him were due to the negligent and careless acts and omissions of the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC, individually and by and through their real, apparent and/or ostensible agents, servants and/or employees, who breached their aforementioned duties to the Plaintiff, David M. Skeberdis.

26. At all relevant times, the Defendants, Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., were responsible for the acts and omissions of their real, apparent and/or ostensible

agents, servants and/or employees, including without limitation Clark Brill, M.D., John P. Collins, D.O., and the other physicians, physician assistants, nurse practitioners, nurses, nursing assistants, therapists and any and all other health care providers and staff providing care to Plaintiff David Skeberdis and/or having responsibility for maintaining a sterile procedure room, sterile field, sterile equipment, and/or sterile medications under the doctrines of *respondeat superior* and/or agency.

WHEREFORE, this claim is brought by the Plaintiff, David M. Skeberdis against the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., in an amount in excess of the minimum jurisdiction of the United States District Court for the District of Maryland, together with costs, fees and such other and further relief as justice requires.

COUNT II
(Loss of Marital Consortium – Negligence – All Defendants)

The Plaintiffs, David M. Skeberdis and Kara Skeberdis, repeat, reallege, adopt and incorporate by reference paragraphs 1 through 26 of this Complaint as though fully set forth herein.

27. Plaintiffs David M. Skeberdis and Kara Skeberdis were, and remain, for all times complained of, husband and wife.

28. Plaintiffs David M. Skeberdis and Kara Skeberdis further aver that as a direct and proximate result of the negligent acts and omissions of the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., as identified above, they did suffer and sustain injury, damage and disturbance to their marital

relationship and that they were deprived, each from the other, of normal and customary services, society, companionship, affection, assistance, and conjugal relationships, and that the same were thereby interfered with, diminished and/or destroyed.

29. The Plaintiffs, David M. Skeberdis and Kara Skeberdis , further aver that all of the injuries, damages and losses complained of, past, present and prospective, were and are due to the negligent acts and omissions of the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., without any negligence or want of due care on the part of the Plaintiffs thereunto contributing.

WHEREFORE, the Plaintiffs, David M. Skeberdis and Kara Skeberdis bring this action against the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., in an amount in excess of the minimum jurisdiction of the United States District Court for the District of Maryland, plus interest, costs and such other and further relief as justice requires.

COUNT III
(Failure to Obtain Informed Consent- - All Defendants)

The Plaintiff, David M. Skeberdis, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 29 of this Complaint as though fully set forth herein.

30. The Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and through their agents, servants and/or employees, real, apparent and/or ostensible, owed to the Plaintiff David M. Skeberdis the

duty of appropriate notification of the various alternatives to the treatment rendered by them and the risks involved in the various modalities of treatment.

31. The Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and/or through their agents, servants and/or employees, real, apparent and/or ostensible, were negligent in failing to appropriately and adequately obtain informed consent from the Plaintiff, David M. Skeberdis, and were otherwise negligent.

32. The Plaintiff further avers that as a direct and proximate result of the negligent and careless acts and omissions of the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and through their agents, servants and/or employees, real, apparent and/or ostensible, in failing to obtain Plaintiff's informed consent, the Plaintiff, David M. Skeberdis, experienced permanent and disabling injuries, a severe shock to his nerves and nervous system, pain, mental anguish, unnecessary procedures, has been and will continue to be obligated to receive hospital and medical care, has been and will continue to be prevented from engaging in his usual activities, duties and pursuits, has incurred and will continue to incur medical expenses in the future, and has been otherwise hurt, injured and damaged.

33. The Plaintiff further avers that all of these injuries and damages were caused by the negligent acts and omissions of the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., individually and through their

agents, servants and/or employees, real, apparent and/or ostensible, in failing to obtain Plaintiff's informed consent, without any negligence or want of due care on the part of the Plaintiff thereunto contributing.

WHEREFORE, this claim is brought by the Plaintiff, David M. Skeberdis against the Defendants Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC., in an amount in excess of the minimum jurisdiction of the United States District Court for the District of Maryland, together with costs, fees and such other and further relief as justice requires.

COUNT IV
(Loss of Marital Consortium – Failure to Obtain Informed Consent)

The Plaintiffs, David M. Skeberdis and Kara Skeberdis repeat, reallege, adopt and incorporate by reference all previous allegations and statements of fact made in this Complaint.


34. The Plaintiffs, David M. Skeberdis and Kara Skeberdis, further aver that they were, for all times complained of, husband and wife.

35. The Plaintiffs, David M. Skeberdis and Kara Skeberdis, further aver that, as a direct and proximate result of the negligent failure to obtain Plaintiff's informed consent by Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC, individually and through their agents, servants and/or employees, as set forth in Count III of this Statement of Claim, Plaintiffs David M. Skeberdis and Kara Skeberdis did suffer and sustain injury, damage and disturbance to their marital relationship and that they were deprived, each from the other, of normal and customary

services, society, companionship, affection, assistance, and conjugal relationships, and that the same were thereby interfered with, diminished and destroyed.

36. The Plaintiffs, , David M. Skeberdis and Kara Skeberdis, further aver that all of the injuries, damages and losses complained of, past, present and prospective, were and are due to the negligent failure to obtain informed consent by Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC, individually and through their agents, servants and/or employees, without any negligence or want of due care on the part of the Plaintiffs thereunto contributing.

WHEREFORE, this claim is brought by the Plaintiffs, David M. Skeberdis and Kara Skeberdis, against the Defendants, Clark Brill, M.D., John P. Collins, D.O., Drs. Collins, Brill & Twigg, P.C., t/a Maryland Spine and Sports Medicine and Maryland Spine and Sports Surgi-Center, LLC, in an amount in excess of the minimum jurisdiction of the United States District Court for the District of Maryland, plus interest, costs and such other further relief as justice requires.

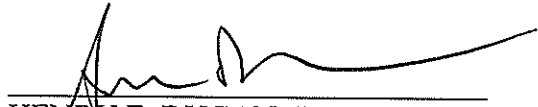


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ELECTION FOR JURY TRIAL

The Plaintiffs, David M. Skeberdis and Kara Skeberdis, by and through their

undersigned attorneys, elect to try this case before a jury.



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